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VIA ECF

Hon. Robert W. Lehrburger
United States Magistrate Judge
U. S. District Court for the Southern District of New York
500 Pearl St.
New York, NY 10007

**Re: *Cuturic v. The Jade Farm LLC, et al.*, Case No. 20-cv-3363 –
Joint Request for Extension of Discovery Deadlines**

Dear Judge Lehrburger:

We represent the Plaintiff in the above referenced matter, and we write jointly with Defendants pursuant to this Court's Individual Rule I(F) to seek an extension of the fact discovery deadline by 90 days, until April 24, 2021. The current deadline for fact discovery is January 25, 2021. The parties are currently engaged in a number of ongoing discovery disputes and will be unable to complete document discovery and depositions within the next two weeks. Because this extension will affect other deadlines in the Civil Case Management Plan and Scheduling Order (Dkt. No. 31), the parties further request that all deadlines in the Scheduling Order be extended by 90 days. This is the first request to extend the discovery deadlines in this matter. All parties consent to this request.

Respectfully submitted,

JOSEPH & KIRSCHENBAUM LLP

/s/ Michael DiGiulio

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